

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
NO. 7:20-CR-167-5M2

UNITED STATES OF AMERICA

v.

JOSEPH MAURINO

**MOTION TO MODIFY TERMS OF
PRE-TRIAL RELEASE**

NOW COMES the Defendant and moves to temporarily modify the terms of pre-trial release:

1. The Defendant, Joseph Maurino, awaits arraignment scheduled for the January 2022 term of court in the Third Superseding Indictment charging him with a conspiracy to manufacture firearms (Count I) and destruction of an energy facility (Count V).
2. Following a detention hearing before this Court, the Defendant was released and now resides in New Jersey with his mother and is supervised by the Probation Office of the federal District of New Jersey.
3. The Defendant requests permission to attend the Christening celebration of his first cousin's child at Café Luna at 3679 Route 9 North, Old Bridge, NJ 08857 between noon and 5:00 pm on March 30, 2022 while remaining in his third-party-custodian's company.
4. The Government consents to this motion.

WHEREFORE, the Defendant respectfully moves this Court to modify the conditions to allow him to travel to the location as described above in paragraph 3 of this motion, and thereafter the conditions revert to the existing pre-trial conditions.

This the 16th day of March, 2022.

/s/ Damon Chetson
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing pleading was served upon opposing counsel by
via CM/ECF.

This the 16th day of March, 2022.

/s/ Damon Chetson

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